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November 22, 2024

VIA ECF

Hon. Paul A. Engelmayer
 United States District Court,
 Southern District of New York
 40 Foley Square, Room 2201
 New York, NY 10007

Re: **Sealing Motion for Jane Street's Motion to Compel,
*Jane Street Group, LLC v. Millennium Mgmt. LLC, No. 1:24-cv-02783 (S.D.N.Y.)***

Dear Judge Engelmayer:

On behalf of Plaintiff Jane Street Group, LLC (“Jane Street”), and pursuant to Your Honor’s Individual Rule 4(B)(2) (Sealing/Redaction Requiring Court Approval), we write to request permission to redact and/or seal portions of Jane Street’s Letter Motion to Compel and its supporting Exhibits that contain Jane Street’s and/or Defendants’ proprietary, commercially sensitive, or trade secret information. *See Playtex Prods., LLC v. Munchkin, Inc.*, 2016 WL 1276450, at *11 (S.D.N.Y. Mar. 29, 2016) (granting redaction request for qualitative market research because “Plaintiffs would be competitively harmed if they were revealed”). Jane Street will narrowly tailor the proposed redactions. *See Dependable Sales & Serv., Inc. v. TrueCar, Inc.*, 311 F. Supp. 3d 653, 666 (S.D.N.Y. 2018) (permitting proposed redactions where a “member of the public reviewing the parties’ redacted submissions . . . would have information sufficient to understand the parties’ arguments and the Court’s adjudication”).

Jane Street will meet and confer with Defendants regarding sealing or redactions of the Letter Motion and Exhibits, and within three business days, Jane Street will file a public redacted version of the Letter Motion and Exhibits, as well as a sealed version with highlighting to indicate the proposed redactions, and an explanation of why Jane Street and/or Defendants seek redaction of the highlighted materials.

Respectfully submitted,

/s/ Deborah K. Brown
 Deborah K. Brown

Attorney for Plaintiff Jane Street Group, LLC
 cc: All Counsel of Record

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